



ATLANTA CINCINNATI COLUMBUS NEW YORK
CHICAGO CLEVELAND DAYTON WASHINGTON, D.C.

October 18, 2021

VIA ECF

Katharine H. Parker
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 750
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: 10/18/2021
DATE FILED: 10/18/2021

MEMO ENDORSED

Re: *Locus Technologies v. Honeywell International Inc.* (“Lawsuit”)
Case No. 1:19-cv-11532-PGG

Dear Judge Parker:

Defendant Honeywell International Inc. (“Honeywell”) and Plaintiff Locus Technologies (“Locus”) have agreed to extend the pretrial deadlines in this case and jointly propose and request the Court’s approval as follows:

1. Substantial completion of document production: **January 31, 2022.**
2. Locus will designate and provide primary expert reports by **January 31, 2022**, and Honeywell will designate and provide primary expert reports by **March 14, 2022**.
 1. Rebuttal expert reports (if necessary): **April 5, 2022.**
 2. Sur-rebuttal expert reports (if necessary): **April 26, 2022.**
3. All discovery cutoff: **May 26, 2022.**
4. The conference with Your Honor, currently scheduled for October 19, 2021, will be rescheduled for the week of **January 17, 2022**, or for a date of the Court’s choosing.

Honeywell waives the dispute concerning the timing only of Locus’ service of its written responses to Honeywell’s discovery requests on September 10, 2021, including Locus’ responses to Honeywell’s Requests for Admission of that same date. Honeywell expressly reserves its rights with respect to all other legal or substantive arguments it may have regarding Locus’ written responses to Honeywell’s first set of discovery requests, including any deficiencies.

Once Judge Gardephe enters a decision on Your Honor’s Report and Recommendation (Doc. 51) on Honeywell’s Motion to Dismiss (Doc. 36), counsel have agreed to meet and confer to determine whether to engage in settlement discussions.

This agreed upon proposal is not interposed for delay, but rather, is necessary to give both parties sufficient time to collect, process, review and produce relevant and responsive documentation, identify

Sean.McCormick@ThompsonHine.com Fax: 937.443.6635 Phone: 937.443.6824

THOMPSON HINE LLP
ATTORNEYS AT LAW

Austin Landing I
10050 Innovation Drive
Suite 400
Dayton, Ohio 45342-4934

www.ThompsonHine.com
Phone: 937.443.6600
Fax: 937.443.6635



October 18, 2021
Page 2

and engage expert witnesses, if necessary, and schedule and conduct fact witness depositions. Therefore, the parties respectfully request that this proposed schedule be adopted by the Court, and that an Agreed Amended Scheduling Order, reflecting the above dates, be entered on the Court's docket.

Respectfully submitted,

/s/ Sean P. McCormick

Sean P. McCormick

Counsel for Defendant Honeywell International Inc.

/s/ Alex Barnett-Howell per email authority
10/18/2021

Alex Barnett-Howell

Counsel for Plaintiff Locus Technologies

The request to adjourn the Status Conference in this matter scheduled for Tuesday, October 19, 2021, at 12:00 p.m. is DENIED. This Status Conference is hereby converted to a telephonic conference and rescheduled to Tuesday, October 19, 2021 at 10:30 a.m. Counsel for the parties are directed to call Judge Parker's AT&T conference line at the scheduled time. Please dial (866) 434-5269; access code 4858267.

SO ORDERED:

A handwritten signature in black ink that reads "Katharine H. Parker".

**HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE**

10/18/2021